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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

THERESA MADRID,  
Plaintiff,  
vs.  
ANDREW SAUL,  
Commissioner of Social Security,  
Defendant.  
CIVIL NO. 4:20-cv-04880-HSG  
STIPULATION FOR 30-DAY  
EXTENSION OF TIME FOR  
DEFENDANT TO FILE ANSWER AND  
CERTIFIED ADMINISTRATIVE  
RECORD (SECOND REQUEST) AND  
ORDER

TO THE HONORABLE HAYWOOD S. GILLIAM, JR., DISTRICT JUDGE OF THE  
DISTRICT COURT:

The parties, by and through their undersigned attorneys, stipulate that Defendant Andrew Saul shall have an additional 30 days, until February 3, 2021, in which to file the Answer and Electronic Certified Administrative Record. Defendant's Answer and Electronic Certified Administrative Record are currently due to be filed by January 4, 2021.

As described in the first motion for extension, in light of the global COVID-19 pandemic, SSA has taken the unprecedented step of suspending in-office services to the public: <https://www.ssa.gov/coronavirus/>. For purposes of this particular case, the public health emergency pandemic has significantly affected operations in the Social Security Administration's Office of

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1 Appellate Operations (OAO) in Falls Church, Virginia. That office is responsible for physically  
2 producing the administrative record that is required to adjudicate the case under Sections 205(g) and (h)  
3 of the Social Security Act, 42 U.S.C. § 405(g) and (h). *See* SSA Program Operations Manual System  
4 GN 03106.025.

5 As detailed in the attached declaration, at the end of November, OAO had more than 10,200 new  
6 court cases waiting to be processed. Additionally, OAO is focusing its efforts on processing the most  
7 aged cases and the pandemic has adversely affected the contractors' capacity to deliver hearing  
8 transcripts. Although overall the timeframe for delivering an administrative record has improved, the  
9 backlog, prioritizing aged cases, and contractor capacity continue to cause some delays.

10 Given the volume of pending cases and the continued constraints, Defendant respectfully  
11 requests a second extension in which to respond to the Complaint until February 3, 2021.  
12

13 Respectfully submitted,

14  
15 Date: January 4, 2021 By: /s/ Sarah Thompson-Peer\*  
16 SARAH THOMPSON-PEER  
17 (\*as authorized by email on Dec. 31, 2020)  
Attorney for Plaintiff

18 Date: January 4, 2021 DAVID L. ANDERSON  
19 United States Attorney  
20 By: /s/ Annabelle J. Yang  
21 ANNABELLE J. YANG  
22 Special Assistant United States Attorney

23 **ORDER**

24 PURSUANT TO STIPULATION, IT IS SO ORDERED:

25 Dated: 1/5/2021

  
26 HON. HAYWOOD S. GILLIAM, JR.  
27 UNITED STATES DISTRICT JUDGE  
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